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14 *Attorneys for Plaintiff Stephen Russell*

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION

15 STEPHEN RUSSELL,

16 Plaintiff,

17 v.

18 NIR MAMAN, et al.,

19 Defendants.

CASE NO. 18-CV-06691-RS

ORDER

**JOINT STIPULATION RE ADR AND CASE
SCHEDULE PURSUANT TO THE
COURT'S JULY 29, 2021 ORDER
AS MODIFIED BY THE COURT**

Dept.: Courtroom 3, 17th Floor
Judge: Hon. Richard Seeborg

21 AND RELATED THIRD PARTY CLAIMS,
22 CROSSCLAIMS, AND COUNTERCLAIMS.
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1 Pursuant to the Court's July 29, 2021 Order directing all Parties to meet and confer regarding
2 scheduling deadlines and potential ADR (Dkt. 239), Plaintiff Stephen Russell ("Plaintiff"),
3 Defendants Nir Maman, Ryan Micheletti, George Akkelquist, Legion Industries, Inc. d/b/a Shield
4 Corps Security, DFW Metroplex Training Academy, and CT707 Israeli Krav Systems, Inc.
5 ("Defendants"), and Third-Party Defendants Ronen Shlomo and Bsecure, (collectively, "the Parties"),
6 by and through the undersigned counsel, jointly stipulate as follows:
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8 WHEREAS, on July 29, 2021, after a videoconference with the Parties, the Court entered an
9 Order directing the Parties to meet and confer to discuss ADR possibilities and scheduling deadlines
10 (Dkt. 239);

11 WHEREAS, on August 4, 2021, counsel for all Parties participated in a meet and confer
12 conference pursuant to the Court's July 29, 2021 Order;

13 WHEREAS, counsel for all Parties have agreed to circulate a list of proposed private
14 mediators and confer with their respective clients as to accepting or rejecting private mediation, and
15 further agreed that should the Parties decide that the advice of Magistrate Judge Kim would be helpful
16 in settlement, the Parties will inform the Court;

17 WHEREAS, the continued deposition of Defendant Nir Maman and the Rule 30(b)(6)
18 deposition of CT707 Israeli Krav Systems, Inc. ("CT707") is scheduled for August 17, 2021, and
19 counsel for Ryan Micheletti anticipate compelling non-party Tara Walsh to appear for deposition;
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21 WHEREAS, if the depositions of Nir Maman, CT 707, and Tara Walsh are completed prior
22 to the proposed close of discovery, counsel for all Parties have agreed to the below proposed case
23 schedule, and subject to Court approval, request that the case schedule be amended as follows:
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Event	Current Deadline	Deadline
Close of Fact Discovery	September 2, 2021	November 2, 2021
Deadline for Defendants and Third Party Defendants to Designate Experts	August 1, 2021	December 2, 2021
Deadline to Designate Supplemental and Rebuttal Experts	August 1, 2021	January 4, 2021
Close of Expert Discovery	August 16, 2021	January 18, 2022
Deadline for Court to Hear Dispositive Motions	October 7, 2021	February 3, 2022
Pretrial Conference	December 1, 2021	April 6, 2022
Jury Trial	December 13, 2021	April 18, 2022

Dated: August 6, 2021

Respectfully submitted,

HOOK & HOOK, PLLC

/s/ Joy D. Llaguno

JOY D. LLAGUNO

PECKER & ABRAMSON, P.C.

/s/ Brian D. Waller

BRIAN D. WALLER

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LEWIS BRISBOIS BISGAARD & SMITH

/s/ Kendall A. Layne

ALEXANDER A. GRAFT

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Attorneys for Bsecure and Ronen Shlomo

ORDER

Pursuant to stipulation and for good cause shown, IT IS SO ORDERED that the case
schedule shall be amended as proposed.

DATED: August 6, 2021



Honorable Richard Seeborg
United States District Judge